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November 3, 2021

Honorable Michael A. Shipp, U.S.D.J.  
United States District Court  
District of New Jersey  
Clarkson Fisher United States Court House  
402 East State Street  
Trenton, New Jersey 08625

**RE:** *New Jersey Second Amendment Society, et al v. New Jersey Press Association, et al.*  
Civil Action No. 20-5228 (MAS0 (LGH))

**Dear Judge Shipp:**

On October 15, 2021 the Court entered a Memorandum Opinion (ECF Document 63) and Order (ECF Document 64) dismissing the plaintiffs' complaint without prejudice and giving plaintiff until November 15, 2021 to file an Amended Complaint. *See* Order at page 2, paragraph 7.

I was recently suddenly hospitalized with an unexpected infection in my shoulder that required immediate emergency surgery, an extensive hospital stay, and now rehabilitation. The doctor has directed that I not returned to work until *at least* November 19, 2021. *See* letter enclosed. In light of this I would ask that the Court extend the time frame in paragraph seven of the October 15, 2021 Order from November 15, 2021 for a period of 60 days. While my staff can do certain things with me providing periodic instructions remotely via telephone, the drafting of this Amended Complaint is something that a secretary or paralegal cannot do and my secretary is out on medical leave for her own shoulder surgery. I must do this work myself, and at the moment I am literally physically temporarily unable to do so and the earliest I will be back to work will not be until November 19, 2021, four days after the deadline. Moreover, my doctor informs me that he will likely extend the time frame beyond November 19, 2021 before I can return to work.

Please advise at your earliest whether this request is granted or whether I have to have a formal motion prepared and filed.

Respectfully submitted,  
*/s/ Albert J. Rescinio*  
ALBERT J. RESCINIO, ESQ.

AJR:ms  
enclosure  
(DICTATED)



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**Date: 11/1/2021**

**To Whom It May Concern:**

**Patient, Albert J Rescinio, was seen in my office today for treatment.**

☒ **This patient will need to be excused from work until 11/19/2021. If there are any questions,  
please contact 732-660-6200.**

**Yours very truly,**

**Richard Borgatti**